

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Angela Dubose

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

United States Postal Service Louis
DeJoy, Postmaster General of the
United States Postal Service,
John Doe (1-10)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

See attached

**Complaint for Employment
Discrimination**

Case No. _____
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

Angela Dubose

Against

Gregg Walker, Willingboro New Jersey
Postmaster

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Angela Dubose</u>
Street Address	<u>72 Medford Lane</u>
City and County	<u>Willingboro, Burlington</u>
State and Zip Code	<u>New Jersey 08046</u>
Telephone Number	<u>609.424-7479</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Louis DeJoy</u>
Job or Title (if known)	<u>Postmaster General of the United States</u>
Street Address	<u>475 L'Enfant Plaza, SW</u>
City and County	<u>Washington</u>
State and Zip Code	<u>DC. 20260</u>
Telephone Number	<u>800-275-8777</u>
E-mail Address (if known)	<u></u>

Defendant No. 2

Name	<u>Gregg Walker</u>
Job or Title (if known)	<u>Postmaster</u>
Street Address	<u>16 Rev Dr. Martin Luther King Jr. Drive</u>
City and County	<u>Willingboro, Burlington, NJ</u>

State and Zip Code _____
Telephone Number _____
E-mail Address _____
(if known) _____

Defendant No. 3

Name _____
Job or Title _____
(if known) _____
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail Address _____
(if known) _____

Defendant No. 4

Name _____
Job or Title _____
(if known) _____
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail Address _____
(if known) _____

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is:

Name Willoughboro Post Office
Street Address 116 Rev. Dr. MLK Blvd
City and County Willoughboro, NJ
State and Zip Code New Jersey 08046-9998
Telephone Number 800-275-8777

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to *(check all that apply)*:



Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)



Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Other federal law *(specify the federal law)*:



Relevant state law *(specify, if known)*:



Relevant city or county law *(specify, if known)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes *(check all that apply)*:

- ☐ Failure to hire me.
☐ Termination of my employment.
☐ Failure to promote me.
☒ Failure to accommodate my disability.
☐ Unequal terms and conditions of my employment.
☒ Retaliation.
☒ Other acts *(specify)*: retaliation, hostile work environment and workplace harassment

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)

May 2019 - August 30, 2019

C. I believe that defendant(s) *(check one)*:

- ☒ is/are still committing these acts against me.
☐ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my *(check all that apply and explain)*:

- ☐ race _____
☐ color _____
☐ gender/sex _____
☐ religion _____
☐ national origin _____
☐ age. My year of birth is _____. *(Give your year of birth only if you are asserting a claim of age discrimination.)*
☒ disability or perceived disability *(specify disability)*

Permanent injury to ankle with hardware making it difficult to walk and stand for long periods of time

- E. The facts of my case are as follows. Attach additional pages if needed.

I filed a EEO complaint for disability discrimination failure to pay me for my (3) day sick leave to care for my daughter and for issuing me a Pre-Disciplinary Interview and Letter of Warning following my inquiry into why I wasn't paid and then I was issued another PDI for my attention which was directly related to the (3) day leave. My EEO was accepted for

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on (date)

- B. The Equal Employment Opportunity Commission (check one):

☐

has not issued a Notice of Right to Sue letter.

☒

issued a Notice of Right to Sue letter, which I received on (date)

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (check one):

☒

60 days or more have elapsed.

☐

less than 60 days have elapsed.

Facts continued:

investigation. I have filed a second EEO complaints which was received for investigation on October 28, 2019, the matter was closed on November 7, 2019. I appealed the decision and it was received for investigation and ended with an unfavorable decision by the Agency on September 24, 2020. The period of these action by Postmaster Walker dates from May 2019-Aug. 2019. I now filed this complaint for the harrassing, hostile and retaliatory actions of Postmaster, Gregg Walker. Postmaster Walker has caused (2) Pre-Disciplinary Actions to be brought against me and (2) letters of warning in retaliation for my EEO filing in January 2019. He has taken away my reasonable accommodation due my disability (injured) ankle and he has caused the unauthorized taking of pictures, excessive monitoring of my daily work, watching and staring at me from behind carrier cases and knocking and standing outside of the bathroom while I was in and using the facility. Gregg Walker has caused both mental and physical harm to me causing me to seek medical assistance and being taken out of work for over (6) months for Post Traumatic Stress and Anxiety.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Damages for back pay, lost wages and medical expenses; punitive damages for back pay, lost wages and medical expenses, harassing, retaliating and hostile conduct towards me

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a non-frivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 12-23, 2020

Signature of Plaintiff

Printed Name of Plaintiff

Angela DuBose
Angela DuBose